

1/4/07-02017

## Capito, Bonnie P CIV NAVFAC Lant

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**From:** Cole, Linda L CIV NAVFAC MidAtlantic  
**Sent:** Thursday, January 04, 2007 8:14 AM  
**To:** Capito, Bonnie P CIV NAVFAC Lant  
**Subject:** ARF Please find attached the Navy's responses to VDEQ's comments on the draft work plan for removal action E (yes, the fifth one) at CAX Site 1

**Attachments:** CTO-69 D 121906 Water Pumping Scheme.pdf; CTO-69 work plan RTC VDEQ -rev 1.pdf



CTO-69 D 121906 CTO-69 work plan  
Water Pumping ... RTC VDEQ -rev...

-----Original Message-----

**From:** Cole, Linda L CIV NAVFAC MidAtlantic  
**Sent:** Thursday, January 04, 2007 8:12  
**To:** [ejshalopek@deq.virginia.gov](mailto:ejshalopek@deq.virginia.gov)  
**Cc:** Donna Caldwell ([dcaldwel@ch2m.com](mailto:dcaldwel@ch2m.com)); [djoiner@mbakercorp.com](mailto:djoiner@mbakercorp.com); [Marlene.Ivester@CH2M.com](mailto:Marlene.Ivester@CH2M.com); ([Mykijewycz.Ben@epamail.epa.gov](mailto:Mykijewycz.Ben@epamail.epa.gov))  
**Subject:** Please find attached the Navy's responses to VDEQ's comments on the draft work plan for removal action E (yes, the fifth one) at CAX Site 1

Eric,

Shaw has prepared for the Navy responses to your comments regarding the work plan at CAX Site 1 (Landfill Near Incinerator). Greyson had indicated in an email before he retired that EPA was satisfied with the work plan. We're looking for your concurrence that we have addressed your concerns adequately and can move forward with finalizing the work plan and moving forward with the mobilization.

Please let me know if you have any further issues with our responses. A favor of a reply that we have adequately addressed your concerns would, of course, be most appreciated.

Thanks!

Linda

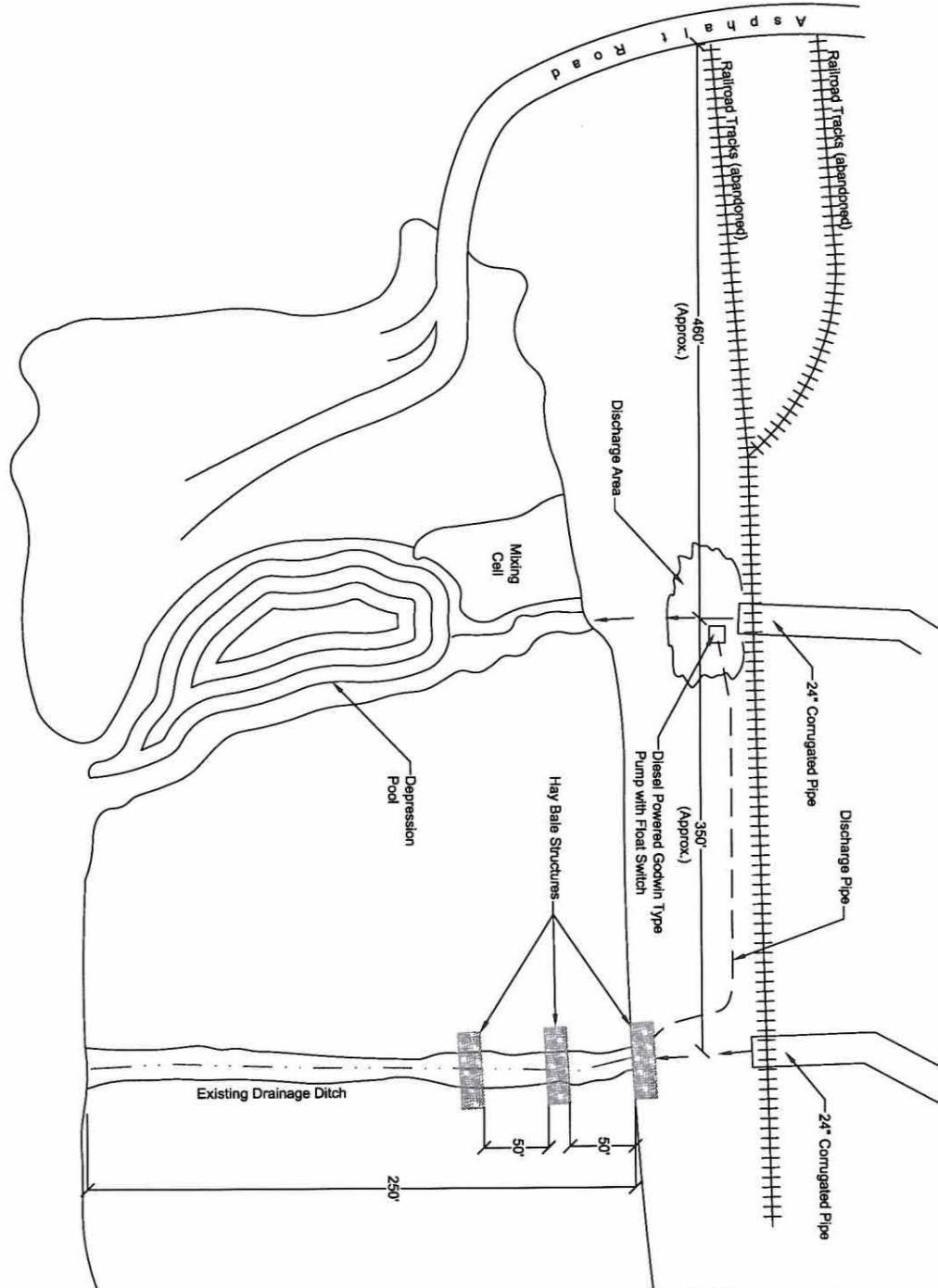
L. L. Cole, P.E.  
Remedial Project Manager  
NAVFAC Mid-Atlantic, Bldg N-26, Room 3208 Hampton Roads Integrated Product Team Nucleus  
Hampton Roads Restoration Product Line, Code OPHREV4  
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Email: [linda.cole@navy.mil](mailto:linda.cole@navy.mil)  
Let's Go Mountaineers!

OFFICE  
Norfolk, VA

DRAWING  
NUMBER  
101189-B3.dwg

DRAWING NOT TO SCALE

YORK RIVER



NAVAL FACILITIES ENGINEERING COMMAND NAVAL STATION ATLANTIC DIVISION NAVAL WEAPONS STATION CHEATHAM ANNEX SITE 1		NORFOLK, VIRGINIA YORKTOWN, VIRGINIA	
DEPRESSION POOL WATER DISCHARGE			
DESIGNED BY WLD 12/18/08		CHECKED BY WLD 12/18/08	
DRAWN BY TPR 12/18/08		APPROVED BY WLD 12/18/08	
REVISIONS			

FIGURE 1

January 3, 2007

Commander, NAVFAC MIDLANT  
9742 Maryland Avenue  
Norfolk, VA 23511  
Attn: Code OPHREV4 Ms. Linda Cole

**RE: RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS,  
DRAFT FINAL WORK PLAN – REMOVAL ACTION E - HOT SPOT REMOVAL AND POND  
RECOVERY AT SITE 1 – LANDFILL NEAR INCINERATOR CHEATHAM ANNEX, WEAPONS  
STATION (NWS) YORKTOWN. CONTRACT N62470-02-D-3260, TASK ORDER NO. 69 SHAW  
PROJECT 121382.**

Dear Ms. Cole:

The purpose of this correspondence is to respond to the comments received from the Virginia Department of Environmental Quality (VDEQ) for the Draft Final Work Plan, Hot Spot Removal and Pond Recovery, Site 1, Cheatham Annex, Naval Weapons Station, Yorktown, Virginia submitted on September 28, 2006. Attached are the comments and our response.

Thank you for providing Shaw E&I with this opportunity. Should you have questions or comments please do not hesitate to call me at (757) 640-6937.

Sincerely,  
Shaw Environmental, Inc



William L. Hughes, R.G.  
Project Manager.



William L. Deane, Jr.  
Project Engineer

Enclosures (1)

cc.  
Brooke Adams                      Shaw Environmental, Inc.  
Kevin Donnelly                     Shaw Environmental, Inc.  
Adair Franklin                    Shaw Environmental, Inc.  
Michal Hart                        Shaw Environmental, Inc.  
Natasha Sullivan                 Shaw Environmental, Inc.  
Project File                        121382



**DRAFT FINAL WORK PLAN  
REMOVAL ACTION E – HOTSPOT REMOVAL AND  
POND RECOVERY AT SITE 1 – LANDFILL NEAR INCINERATOR  
CHEATHAM ANNEX, WEAPONS STATION (NWS) YORKTOWN**

1. **(1) VDEQ:** “Please define if this removal action was being conducted as a TCRA or a non-TCRA. If TCRA, then please reference the Action Memorandum. If non-TCRA, please reference the EE/CA.”

**RESPONSE:** The removal action proposed at Site 1 is a non-Time Critical Removal Action (non-TCRA) and therefore will be conducted under the guidance of Baker’s June 2003 Engineering Evaluation/Cost Analysis Report (EE/CA), entitled “Engineering Evaluation/Cost Analysis for Contaminated Soil, Site 1-Landfill Near Incinerator. Naval Weapons Station Yorktown, Yorktown, Virginia, Cheatham Annex Site” June 2003.

2. **(2) VDEQ:** “Please briefly define the nature of “removal...of said debris.” Can this debris be defined as CDD, sanitary, industrial or military specific in composition?”

**RESPONSE:** The debris being removed from the site can be classified as sanitary. Shaw anticipates encountering organically and inorganically contaminated soils and sediments during the removal action. If debris is discovered, this will be removed and disposed of accordingly. Language indicating this has been added to section 1.1 Background.

3. **(3) VDEQ:** “This section stated ‘Shaw has developed an operational approach for the remedial action at WPNSTA Yorktown...’ Section 1.1 defined the upcoming activities at Site 1 to be a removal action in nature. Please note that Section 3.4 also references remediation activities. For consistency purposes, please address this apparent discrepancy between CERCLA programmatic approaches via the remedial versus removal processes.”

**RESPONSE:** The text in the plan was revised to read: “Shaw has developed an operational approach for the *removal* action at WPNSTA Yorktown...”

4. **(4) VDEQ:** “This section stated ‘The soils will be mixed in the pool area and be transferred to the mixing cell adjacent to the proposed excavation area.’ It appears that soil confirmation sampling is not proposed for the area beneath the mixing cell. Due to the possibility of an inadvertent breach (during equipment operation and/or waste placement) in the plastic sheeting beneath the mixing cell, DEQ recommends post excavation composite soil sampling activity be conducted”

**RESPONSE:** Shaw will conduct confirmation sampling of the soil within the footprint of the mixing cell upon its demolition for the contaminants of concern as listed in Table 3-1 of the draft final work plan. The work plan will be revised to reflect the change.

5. **(5) VDEQ:** “This section stated ‘This will allow water flowing into the site to be pumped around the area of excavation and into the river...’ this office has concerns about the perception of a point source discharge of collected storm water, flowing directly into the York River. For obvious reasons, please consider creating an infiltration gallery (at the discharge point, illustrated in Figure 4) in which conveyed storm water can be allowed to infiltrate back into the surrounding soils and/or surificially flow back into the York River, versus a hard-pipe discharge. Also, this office recommends that potential suspended solids (conveyed in the storm water) be addressed via a filter fabric or sediment trap structure.”

**RESPONSE:** Shaw will install a self priming centrifugal pump near where the railroad tracks were removed

at the top of the hill on the west side of the site. The pump will take suction in the pool created naturally by the discharge of a storm sewer pipe. The pump will discharge approximately 350 feet north through a tiered set of hay bales and into a natural drainage flow. The hay bales will filter any sediment from the water as well as act as velocity disrupters. The water will continue through the hay bales and flow uninterrupted along its natural path. This change will be reflected in the work plan.

6. **(6) VDEQ:** "This section stated 'The fill material will be placed within the excavation area...' Has the Navy conducted a chemical analysis on this fill material?"

**RESPONSE:** All fill material will be tested for the same contaminants of concern as listed in Table 3-1 prior to placement on the site. The draft final work plan will be changed to reflect this action.